

RECEIVED

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA 47
RASBIAN M. WARD AIS # 153328

Full name and prison number
of Plaintiff(s)

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

v.
CORIZON INC., MEDICAL SERVICES

CIVIL ACTION NO. 2:18-cv-759-MHT-WC
(To be supplied by Clerk of
U.S. District Court)

DOCTOR BELL, "STATON HCU"

DEMAND FOR JURY TRIAL

DOCTOR RAMINE, "KILBY HCU"

DEPUTY COMMISSION, ELLISON

Name of person(s) who violated
your constitutional rights.
(List the names of all
persons.)

1. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court
dealing with the same or similar facts involved in this
action? YES () NO (XX)

B. Have you begun other lawsuits in state or federal court
relating to your imprisonment? YES () NO (XX)

C. If your answer to A or B is yes, describe each lawsuit
in the space below. (If there is more than one lawsuit,
describe the additional lawsuits on another piece of
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if
state court, name the county) _____

3. Docket number _____

4. Name of judge to whom case was assigned _____

5. Disposition (for example: Was the case dismissed?
Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit _____

7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT Limestone Corrections Facility--H Dorm
43A--28779 Nick Davis Rd. Harvest, Ala. 35749
PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Staton Health Care,
"HCU", Kilby Health Care "HCU."

III. NAME AND ADDRESSES OF INDIVIDUAL(S) YOU ALLEGED VIOLATED YOUR
CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. Corizon Inc.,--103 Powell Court---Brentwood, TN. 37027---
2. Corizon Inc., 101 Airport Commons Dr. Calera, Ala. 35040
3. Staton Health care "HCU"--P.O. Box 56--Elmore, Ala. 36025
4. Kilby Health Care "HCU"--P.O. Box 150 MT. Meigs, Al. 36057
5. _____
6. _____

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED From about August 2015
through to January 2018 and still ongoing.

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION
THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

"SEE ATTACHED SHEETS"

GROUND ONE: _____

G R O U N D S

1. Plaintiff asserts that Corizon Inc., policy as only permitties a nurse to send plaintiff to the hospital in a life threatening sitution and or non-life threatening sitution of first calling a physician "Doctor Bell", is a serious delay in having his medical condition cared for.

2. Doctor "Ramine" was deliberate indifferent to plaintiff's serious medicval needs when he refused to allow for the medical staff "Nurses" to care for him while in the infirmary ar "Kilby HCU," forcing plaintiff to rely on help from unprofessionals "other inmates" who had their own medical problems to care for.

3. Corizon's Inc., :Doctor Bell" at Staton's HCU unit, acted willfully, wantonly, msliciously, and with reckless and callously disregard for ordering this plaintiff not to be transported to a hospital and for not instructing the nurse on suty to provide pain medication for his severe pain after being informed that it was signs his hip was fractured.

4. staton's "HCU" facility through Corizon Inc., has an inadequate screeningh of and evaluating prisoners to indentfy those in need of medical health care treatment, thereby implementing these widespread customs, policies, and practacties for financial reasons/profits and was deliberate indifference to the serious medical need of this plaintiff.

5. Corizon's Medical sraff "Doctor Bell" at Staton Health Care "HCU" willfully and callously disregarded plaintiff's "TWO (2) fractures in his hip for about three (3) days and forced plaintiff to suffer some of the worst severe pain, in violation of his constitutional right to receive adequate and timely medical treatment, "Eight Amendbment."

6. Plaintiff's right to be free from cruel and unusal punishment was violated when "Doctor Bell" allowed him to be in the infirmary form September 30, 2017 until October 2, 2017, after being advised by the nurse on duty that she was sending him to the hospital for possible hip fracture.

7. Corizon Inc., has deprived plaintiff of his right under the U.S. Constitution and under color of state law, by being deliberate indifference to his serious medical conditions "NERVE DAMAGE TO LEFT LEG," "CYST BEHIND LEFT LEG," SEVERE PAIN TO PENIS," TEAR TO LEFT KNEE, AND SERVE PAIND CONSTANTLY FOR ALL THESE MEDICAL CONDITIONS FOR ABOUT THREE (3) YEARS," INVOLATION OF THE EIGHTH AMENDMENT WHICH PROHIBIT CRUEL AND UNUSAL PUNISHMENT.

8. Corizon was gross neglegence and reckless disregarded this plaintiff's right to a timely and professionally, appropriate medical treatment for his severe nerve condition in which plaintiff has suffered for about (3) three years.

9. Corizon's status quo of its policies, customs and practies of not proving health care treatment to plaintiff until the co-pay sheet is signed, is to controlling

10. Corizon's sick call procedures, implemented at Staton Health Care "HCU" either resulted in no care, delayed care or treatment that did not get to the root of the medical problem/condition.

11. Doctor Bell caused plaintiff severe nerve condition to exacerbate through Corizon's Inc., policies, practices and or customs of implementing these cost cutting policies for financial gain for the company and to show the ADOC that it can save them money at a rate "percentage " lower than them had it not contracted it out.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (state as best you can the time, place and manner and person involved)

GROUND TWO: "SEE ATTACHED SHEETS"

SUPPORTING FACTS: "SEE ATTACHED SHEETS"

GROUND THREE: "SEE ATTACHED SHEETS"

SUPPORTING FACTS: "SEE ATTACHED SHEETS"

ACTUAL FACTS

On or about August 28 2015, Plaintiff awaken with severe pain to left leg, could not stand or walk, ankle was swollen, it felt as if something was wrapped real tight around it cutting off the circulation, had to be taken to the HCU at Staton Health Care.

The only thing done was to give me Motrin (600mg), this did not stop the pain nor allow for me to stand or walk, I was sent back to Draper where I was housed, after complaining to the administration, I was sent back to the HCU, where I was not seen by a doctor, the nurse gave me (100mg) of nurotine, this to did not stop the pain or allow me stand or walk.

Plaintiff was given a cane to stand and walk with, this went on for over one (1) year, during this time Plaintiff filed numerous grievances and sick call requests, no one (doctor) could determine what was causing this medical condition, PLAINTIFF START SENDING GRIEVANCES TO CORIZON MEDICAL SERVICES HEADQUARTERS IN BRENTWOOD TENN. THAT THE MEDICAL STAFF BEGAN TO SEND ME OUT TO SPECIALISTS, THIS WENT ON FOR MONTHS GOING TO A ORTHOPEDIC TWO (2) TIMES AND HE COULD NOT DETERMINE WHAT WAS CAUSING IT WAS RECOMMENDED BY HIM THAT I SEE A NUROLOGIST, AFTER BEING EVALUATED BY TWO (2) nurologists I WAS SENT AND GIVEN A ELECTIC AND PIN TEST, THIS REVEALED THAT I HAD A SERVEE NERVE DAMAGE TO MY BACK AT L4 and L5 WHICH WOULD REQUIRE SURGERY.

NOTE: This process took over two (2) years, and the filing of over (10) to about twenty (20) grievances, sick call requests, being sent to HCU for emergency numerous times by the DOC staff at Draper because I continued to have problems with standing, walking and the severe pain, none of the medications given helped with this pain, numerous grievances, sick call requests was submitted putting the medical staff on notice that none of medications was working.

The medical staff forced plaintiff to sign the co-payment slip before being seen by a provider of doctor, each time plaintiff refused to sign co-payment sheet, the nurse would not provide any medical service, most of time the only thing done by the nurse was to take vital signs and say watch for your name on the news letter, in the mean time, I suffered because no medical care was given, the only thing the medical staff wanted was to collect co-payments.

During this same time, plaintiff had an infection to his penis, pain when peeing, red spots on the tip, white stuff caking all around it, bad smell and sore to the touch, the medical staff said it was a yeast infection and gave me some cream, THAT DID NOT HELP, THIS MEDICAL PROBLEM STARTED BACK IN 2007, I continued to complain about this, only cream was given, grievances and sick call requests was submitted, but the medical staff could not figure out what was causing this infection, a STD test was given, that game back negative.

The medical staff stop trying to find out what this infection was and plaintiff continued to suffer this severe pain, red spots, bad smell, and white stuff caking during the same time he suffered with the severe pain to left leg which caused plaintiff to have problems standing and walking for well over two (2) years.

Plaintiff was sent to Brookwood Medical Center to see a nrsurgeon for an operation on his back, the doctor told plaintiff that he was putting off the sugery until a (DIE) test could be done to determine where the nerve damage was and how severe it was, this was documented and plaintiff informed the provider when he returned to Staton Health Care (HCU) and was told that he would have the test in about a month, OVER THREE (3) or more months went by and plaintiff had not had the DIE test.

While waiting on this test, plaintiff on or about September 29 2017, plaintiff fell down some steps and had to be taken to Staton Health Care (HCU), plaintiff was crying, hollowing and screaming because of the pain coming from the same left leg, the nurse asked me to pull my pants down plaintiff could not due to the pain, another inmate had to do it for me, the nurse made the statement (oh my God), plaintiff's left leg was about two (2) times bigger than the right and something was moving causing extreme pain, the nurse said that she was going to send me to the hospital, she then left the room, when she came back, I was told that Doctor Bell said not to send me to the hospital, to admit me in the infirmary until an X ray can be done Monday,

IT TOOK THREE (3) OTHER INMATES TO PUT PLAINTIFF IN THE BED, ALL THE WHILE THIS WAS BEING DONE, PLAINTIFF WAS CRYING, HOLLOWING AND SCREAMING ASKING FOR SOMETHING FOR PAIN, THE NURSE TOLD PLAINTIFF THE DOCTOR DID PRESCRIBE ANY FOR ME, THAT SHE DID NOT HAVE THE AUTHORITY TO GIVE ME ANY WITHOUT THE DOCTOR PERMISSION.

PLAINTIFF WAS PLACED ON THE BED ON HIS BACK AND GIVEN A PISS BOTTLE, THIS WAS SEPTEMBER 292017 ON FRIDAY NIGHT.

PLAINTIFF LAID ON HIS BACK FROM FRIDAY SEPT. 29, 2017 UNTIL MONDAY OCT. 2, 2017, DURING THIS TIME, "PLAINTIFF DID NOT MOVE, DUE TO THE PAIN AND SOMETHING MOVING IN HIS HIP, PLAINTIFF DID NOT DRINK ANY WATER, OR EAT ANYTHING BECAUSE HE WAS TRYING NOT TO TAKE A DUMP OR PISS BECAUSE THAT CALLED FOR MOVING, THE OTHER INMATES WAS COMPLAINING ABOUT ME KEEPING AWAKE WITH MY CRYING, HOLLOWING AND SCREAMING AT TIMES ASKING FOR SOME PAIN MEDICATION, THE NURSE KEPT TELLING ME THAT SHE COULD NOT GIVE ME ANY BECAUSE THE DOCTOR SAID WAIT UNTIL AFTER THE X RAY MONDAY.

NOTE: PLAINTIFF WAS ALSO STILL SUFFERING FROM THE NERVE DAMAGE TO HIS LEFT LEG.

DOCTOR BELL CAME TO WORK ABOUT 9:00am ON MONDAY MORNING AND DID NOT COME TO THE INFIRMARY TO CHECK ON PLAINTIFF, ABOUT 2:30pm ON OCTOBER 2, 2017, ABOUT THREE (3) INMATES TRIED TO GET PLAINTIFF OUT OF THE BED TO GO TO X RAY, BUT COULD NOT DO IT FOR PLAINTIFF CRYING, HOLLOWING TELLING THEM THAT SOMETHING WAS MOVING IN HIS LEFT HIP, AFTER A WHILE, THEY GOT PLAINTIFF UP AND PLACED HIM IN A WHEELCHAIR AND WENT TO X RAY, THE X RAY REVEALED THAT PLAINTIFF HAD FRACTURED HIS HIP IN TWO (2) PLACES, A ABULANCE WAS CALLED AND PLAINTIFF WAS TAKEN TO JACKSON MEDICAL CENTER, WHEN THE DOCTOR FROM JACKSON CAME IN THE ROOM HE ASKED FOR THE X RAY, THE NURSE SAID THE DOCTOR FROM STATION HEALTH CARE DID NOT SEND IT, A ANOTHER X RAY HAD TO BE TAKEN, AFTER THIS X RAY, THE DOCTOR ASKED ME DID I HAVE A PROBLEM TAKING MORFINE, PLAINTIFF TOLD THE DOCTOR THAT HE HAD NOT HAD ANY PAIN MEDICATION AT ALL.

PLAINTIFF AWAKEN SOME HOURS LATER AND WAS TOLD THAT THE OPERATION WAS OVER, THAT A ROD AND FOUR (4) SCREWS WAS PLACED IN MY LEFT HIP.

"KEEP ON MIND" "PLAINTIFF WAS SUFFERING FROM PAIN TO HIS PENIS, PAIN TO HIS ACKLE, LEFT LEG AND PAIN TO LEFT HIP ALL AT ONE TIME."

PLAINTIFF WAS TRANSFERRED TO KILBY CORRECTIONS FACILITY HCU ON OCTOBER 6, 2017, PLAINTIFF WAS PLACED IN THE INFIRMARY, PLAINTIFF COULD NOT STAND,

OR WALK, A DOCTOR NAME "RAMINE" CAME AROUND WITH A NURSE WANTING TO KNOW HOW I WAS FELLING, I EXPLAINED TO HIM THAT I WAS IN SEVERE PAIN, MY LEFT HIP DOWN TO MY KNEE WAS TWO TIME BIGGER THAN MY RIGHT, THAT I COULD NOT GET UP OUT OF THE BED, THIS DOCTOR CAME AROUND WITH HIS PAD IN HIS HAND TAKING NOTES I GUEST, HE NOT ONE TIME PHYSICALLY TOUCHED (EXAMINED) ME, I ASKED THAT I BE GIVEN A PHYSICAL THERAPIST, HE (DOCTOR RAMINE) STATED THAT THEY DO NOT GIVE PHYSICAL THERAPIST, "THAT IF I WANT TO LEARN HOW TO WALK AGAIN, THAT I WOULD HAVE TO GET OUT THE BED AND DO IT MYSELF, NO NURSE OR DOCTOR WHILE PLAINTIFF WAS AT KILBY BETWEEN OCTOBER 6, 2017 AND OCTOBER 18, 2017 EVER PHYSICALLY EXAMINED "TOUCHED" "HELPED" PLAINTIFF,

THE NURSE ONLY CAME AROUND AND GAVE PLAINTIFF PAIN MEDICATION THAT DID NOT STOP THE PAIN, PLAINTIFF COULD NOT TAKE HIS CLOTHES OFF TO SHOWER, OTHER INMATES THAT WAS IN THE INFIRMARY FOR THEIR ON MEDICAL PROBLEMS, HELPED PLAINTIFF OUT OF THE BED, TOOK ME TO THE SHOWER, TOOK MY CLOTHES OF, GAVE ME A SHOWER, PUT MY CLOTHES BACK ON AND TOOK ME BACK AND PLACE BACK IN THE BED, THIS WAS DONE FOR THE WHOLE TIME THAT I WAS AT KILBY.

PLAINTIFF CAME TO THE CONCLUSION THAT NONE OF THE MEDICAL STAFF WAS GOING TO HELP WITH HIM TRYING TO LEARN HOW TO WALK, PLAINTIFF GOT SOME OTHER INMATES TO HELP WITH TRYING TO WALK WITH A WALKER, THEY WALKED IN FRONT OF ME REAL SLOW AS I TRIED TO MOVE ME LEGS.

WHEN THE DOCTOR "RAMINE" SEEN THE OTHER INMATES HELPING ME, HE WROTE ME A PROFILE FOR THE WALKER.

ON OR ABOUT OCTOBER 18, 2017, TWO OFFICER FROM DRAPER CORRECTIONS FAC. TO TRANSPORT ME BACK TO STATION HEALTH CARE (HCU), I PACKED MY PROPERTY AND A INMATE HELPED ME TO RECEIVING, WHILE THERE, SOME ONE FROM THE NURSES STATION TOLD THE OFFICER TO NOT LET PLAINTIFF LEAVE WITH THE WALKER, I SHOWED THE OFFICER THE PROFILE, HE SAID IT DID NOT MATTER, HE WAS TOLD TO NOT LET ME LEAVE WITH IT.

PLAINTIFF COULD NOT STAND NOR WALK ON HIS OWN, A INMATE HAD TO HELP ME TO RECEIVING, THE OFFICER TOOK THE WALKER, PLAINTIFF HAD TO HOLD ON TO THE COUNTER TO KEEP FROM FALLING, THE OFFICERS THAT CAME TO TRANSPORT ME HAD TO PHYSICALLY PICK PLAINTIFF UP AND CARRY HIM ABOUT FIVE (5) OR MORE LINKS TO GET ME IN THE VAN, IT FELT LIKE MY WHOLE LEFT SIDE (HIP) WAS COMING APART, THE PAIN WAS SO INTENSE, TEARS WAS RUNNING DOWN PLAINTIFF FACE.

PLAINTIFF WAS SEEN BY DOCTOR (BELL), PLAINTIFF TOLD HIM THAT HAD THEY SENT HIM TO HAVE THE "DIE" TEST SO HE COULD HAVE THE OPERATION THAT HE WOULD NOT HAVE FELL AND FRACTURED HIS HIP, THAT KNEW THE NERVE CONDITION CAUSES HIS LEFT LEG TO GIVE OUT, CAUSING HIM TO FALL. DOCTOR "BELL" TOLD PLAINTIFF THAT HE COUNSELED THE DIE TEST AND OPERATION, BECAUSE HE FELT I DID NOT NEED IT, PLAINTIFF EXPLAINED TO HIM THAT HE HAD JUST TOOK OVER MY CASE LOAD, THAT I HAD BEEN UNDER DOCTOR HEARING FOR OVER TWO (2) YEARS WITH THIS MEDICAL CONDITION THAT HAD NOT YET BEEN RESOLVED/CORRECTED.

PLAINTIFF ASKED DOCTOR BELL FOR A PHYSICAL THERAPIST, HE SAID TO DO MY OWN THERAPY, DOCTOR BELL DID NOT ONCE PHYSICALLY EXAMINE OR EVALUATE MY MEDICAL CONDITION TO CHECK OUT MY HIP, NERVE CONDITION, OR THE CONSTANT PAIN IN PENIS WHEN PEEING OR THE RED SPOTS AROUND IT, HE DID NOT LOOK IN MY FILE, JUST SET THERE DOING NOTHING BUT TALKING.

Doctor Bell was told by plaintiff that something was moving in his causing severe pain when walking and laying down, he doctor Bell did not even check to see what it was, plaintiff filed a grievance.

On one visit to see doctor Bell, plaintiff was told that if he keep on complaining, that he would stop seeing me, plaintiff started telling the doctor that he was just trying to explain what was going on with his medical condition, doctor Bell got up and walked off telling the officer to see me out, he refused to do any evauation/treatment, a grievance was filed.

Plaintiff filed a grievance on Doctor Bell because when visiting him for medical treatment, plaintiff told him about the swelling in ankle, swelling on knee, circulation being cut off to feet, pain in hip and how the left leg was giving out causing him to go down to the flour, DOCTOR BELL DID NOT ONE TIME ASK PLAINTIFF TO PULL HIS PANTS DOWN OR OFF TO EVALUATE.

Doctor Bell informed plaintiff that he has a tear in his knee, that I was going to havepiptic surgery to correct it. THIS WAS OVER TWO (2) MONTHS AGO, AND PLAINTIFF HAS NOT HAD THE SURGERY.

THIS TEAR IS CAUSING SEVERE PAIN TO THE INSIDE OF PLAINTIFF'S KNEE, WHEN LAYING DOWN ON THE BED, PLAINTIFF HAVE TO PUT A TOWEL BETWEEN HIS LEGS TO KEEP THEM FROM TOUCHING DUE TO THE PAIN CAUSED WHEN TOUCHED.

Plaintiff continue to suffer severe pain to his hip, ackle, knee, and left leg due to the nerve condition.

Doctor Bell said that I have a "Degenerative Desease" to my back, which is causing my left leg to give out when walking, that I would have to have surgery to correct it, plaintiff was scheduled to have surgery but Doctor Bell counseled it without plaintiff's knowledge, it was not until after plaintiff fractured his left hip in two (2) places and returned from having the operation about a month later, as stated earier, plaintiff went to Brookwood Hospital to have the surgery but was rescheduled to have a dié test, the too was counseled by Doctor Bell.

Plaintiff has been told that he has a CYST behind his knee, but nothing has been done to treat this medical condition, the cyst behind my knee has gotten bigger iver the past two (2) years and no medical treatment has been givem, on a scale of 1 to 10 the pain level is about a 7, this was told to Doctor, Bell, Doctor Herring, and the 4 or 5 providers plaintiff has been seen by.

CONTINUE ACTUAL FACTS

1. On or about August 28, 2015, plaintiff was awaken by severe pain to left leg, could not stand, or walk, ankle was swollen and left foot felt as if though simething was wraped real tight around it cutting the circalation off from the tip of my toe up to the ankle.

2. Two inmates helped me to shéft office to see about going over to Staton Health care (HCU), the officer called over there abd was told to tell me to fill out a sick call request, the pain was so intense that tears was running down my face.

3. Plaintiff on or about August 28, 2015, fillied out the sick call request explaining that I had severe pain to left leg, could not stand nor wlak, that ankle was swollen with circulation being cut off.

SEE EXHIBIT ONE

4. On or about August 31, 2015, plaintiff was seen by provider "ms. Barnette" where she sent me over to Staton Health Care (HCU) at 9:am.

SEE EXHIBIT TWO

5. At about 12:55pm., Ms Barnette seen plaintiff but could not explain what was causing these condition to left leg, so she wrote a no standing profile and the use of a cane X 20 days. SEE EXHIBIT THREE

6. Plaintiff received another medical profile for a cane X 90 days on September 20, 2015, SEE EXHIBIT FOUR, also plaintiff received a profile for no standing X 14 days. SEE EXHIBIT FIVE

7. On September 25, 2015, Plaintiff was sent to Staton Health Care (HCU) for an emergency because he could not stand, walk and medication I needed to be renewed, WAS REFUSED TO BE SEEN, TOLD TO PUT IN A SICK CALL REQUEST AND SENT AWAY.

8. On September 27, 2015, Plaintiff turned in a sick call request to see Ms. Barnette about not being able to stand to take a bath, pee, wash my feet, shave because of severe pain, that something burning was running down on the inside of left leg and could not sleep because of the pain.
SEE EXHIBIT SIX

9. On or about September 30, 2015, plaintiff was seen by nurse Simpson at sock call. I explaining his medical conditions, that Ms. Barette had said she was signing me up to see the doctor, was told that I was not signed up to see a doctor.

10. On or about July 29, 2015, plaintiff filed a grievance concerning two sick call requests that had been submitted on July 2, 2015 and July 7, 2015 about the pain on penis, red spots on the tip, bad smell and white stuff caking up around it, THE NURSE ONLY TOOK VITAL SIGNS AND DID NOT ALLOW ME TO SEE A DOCTOR NOR PROVIDER, AT THIS TIME THE MEDICAL CONDITION HAD WORSEN.

SEE EXHIBIT SEVEN

11. On or about October 5, 2015, plaintiff filed grievance because the med. to help with the nerve pain to left leg had run out, was trying to see Ms. barnette "provider." See EXHIBIT EIGHT

12. On or about October 7, 2015, plaintiff submitted a grievance appeal concerning not being seen by either a doctor or provider about the severe pain on the inside of penis, red spots, bad smell and white stuff caking up on it. SEE EXHIBIT NINE.

13. On or about October 15, 2015, plaintiff submitted a request to see doctor or provider about medical condition with left leg. SEE EXHIBIT TEN

14. On or about October 25, 2015, plaintiff submitted a sick call request to see doctor or provider about the medication "neurontine" prescribe for pain that was making plaintiff sick, vomitting, swollen behind the knee, intense pain when standing and walking, the infection to penis, burning pain, redness bad smell and white stuff. SEE EXHIBIT ELEVEN

15. On or about November 6, 2015, plaintiff submitted a request to be seen by a doctor about the intense "severe" pain to left leg. SEE EXHIBIT TWELVE

16. On or about November 23, 2015, plaintiff submitted a request concerning the medical problem with penis, STD TEST CAME BACK NEGATIVE, BUT THE PAIN SPOTS, SMELL AND WHITE STUFF STILL PRESISTED, PLAINTIFF WAS ASKING FOR MORE TESTS TO BE DONE TO RESOLVE THIS INFECTION. SEE EXHIBIT THIRTEEN

In this grievance appeal, plaintiff explained in details the symtoms concerning the medical problems with penis, and severe pain to left leg.

17. Plaintiff submitted grievance concerning the nerve condition, cyst, delaying sending me to the hospital for about three (3) days with two (2) fractures in my hip, not given any pain medication for them about three (3) days, 12-6-2017 SEE EXHIBIT FOURTEEN

18. On 12-9-2015, plaintiff submitted request complaining about severe condition with penis and left leg. NO RESPONSE. SEE EXHIBIT FIFTEEN

19. Plaintiff on 12-15-2015, submitted grievance appeal concerning severe conditions about penis, the unanswered grievance on 7-29-2015, 11-6-15 and 11-23-2015. SEE EXHIBIT SIXTEEN

20. On or about 12-23-15, plaintiff submitted request to see Ms. Barnette about ongoing medical problems with penis and left leg. SEE EXHIBIT SEVENTEEN

21. On or about 1-3-2016, plaintiff submitted sick call request to be seen by provider and or doctor concerning severe pain to penis, left leg, medication and profiles. SEE EXHIBIT EIGHTEEN

22. On or about 1-14-2016, plaintiff submitted grievance concerning not being seen by a doctor or provider about the pain in penis, red spots on it, bad smell and white stuff around it, also about not receiving pain medication for left leg, swelling behind knee, etc. AND CONTINUED TO BE FORCED TO FILL OUT SICK CALL REQUESTS TO COLLECT CO_PAYMENTS. COPY SENT TO CORIZON HEADQUARTERS. SEE EXHIBIT NINETEEN

23. On or about 2-3-16, plaintiff forwarded a letter/complaint to Corizon Headquarters on Ms. Barnette, Doctor Herring and Ms. Copeland concerning denial of adequate medical treatment, these medical staffs has not diagnosed nor evaluated my two (2) medical conditions, severe pain to penis, red spots on tip, bad smell and white stuff caking up on it for about one (1) year and a half (½), also no pain medication for severe pain in left leg, swelling behind knee and ankle, not being able to stand or walk. SEE EXHIBIT TWENTY

24. On or about 2-6-16, plaintiff filed grievance appeal notifying medical staff that a copy of said grievance appeal was sent to Corizon corporate in Brentwood TN. SEE EXHIBIT TWENTYONE

25. Plaintiff on or about 2-10-16, submitted sick call request to see provider about pain medication for left leg. SEE EXHIBIT TWENTYTWO

26. On or about 3-3-16, plaintiff filed grievance because he had not been seen by provider about medical condition with penis and left leg. SEE EXHIBIT TWENTYTHREE

27. Plaintiff received cane and slide profile from provider S. Oden. SEE EXHIBIT TWENTYFIVE

28. On or about 10-25-16, plaintiff filed grievance about lack of pain medication for left leg, ms. Barnette, Dr. Herring, Dr. Lovelace and provider Oden said it was a nerve problem, however, plaintiff still is suffering from this medical problem now over two (2) years with no relief in sight. SEE EXHIBIT TWENTYSIX

29. On or about 11-9-16, plaintiff filed grievance appeal concerning the severe pain, not being able to stand nor walk, not being sent back to neurology. SEE EXHIBIT TWENTYSEVEN

30. On or about 11-15-16, plaintiff submitted sick call request to see provider because condition has worsen. SEE EXHIBIT TWENTYEIGHT

31. On or about 11-17-16, plaintiff submitted sick call request because he had been seen by anyone on the last one submitted, having problems standing, walking, severe pain to left leg, ankle swollen, and pain medication not helping. See Exhibit 29

32. On or about 12-29-16, plaintiff submitted sick call request because the pain medication continued to run out. See Exhibit 30

33. On or about 1-31-17, plaintiff submitted grievance concerning not being adequately treated for over one (1) year and a half ($\frac{1}{2}$), severe pain, and notifying the medical staff that a civil suit is coming, that a copy of grievance is being sent to Corizon Health Corporate Office at 103 Powell Court Brentwood TN. 37027. See Exhibit 31


34. On or about 2-23-17, plaintiff filed grievance appeal because it had been over one (1) year and a half ($\frac{1}{2}$) and his nerve condition had not been corrected fact it had worsen to the point where his left leg gives out when walking, causing plaintiff to fall to the floor, the only thing besides taking tests, plaintiff was given medication that did not reach the severe pain that persisted.

See Exhibit 32

35. Plaintiff was sent to Brookwood Medical Center to see a Dr. Pearson "Nursurgeon" to have surgery on back to correct nerve damage, after talking with this doctor, he decided to postpone the surgery until a "Die" test is done to see how much damage was done and where it was.

The medical staff at Staton Health Care "HCU" was made aware of this through documentation forwarded to them by the nursurgeon and verbally by myself.

36. After a few months had passed, plaintiff checked to see why he had not had the die test, the provider told plaintiff that it was counseled alone with the surgery, that she did not know who did it, that it was from someone outside the medical staff there.

37. On or about April 5, 2017, plaintiff was given a profile for a cane X 90 days, by provider Barnette. See Exhibit 33.

38. On or about April 5, 2017, plaintiff was given a notice telling him to report SHCU to see neurology consultant, by provider Kjolly UPN. See Exhibit 34

39. On or about 9-26-2017, plaintiff submitted sick call request for follow up, to have profiles renewed, "Die" test, because neither had been done. See Exhibit 35

40. On or about 9-30-2017, plaintiff was going up some stairs when his left leg gave out causing him to fall backward, plaintiff was placed in a wheel chair by two (2) other inmates and taken to HCU.

The pain was so intense that plaintiff was crying, screaming and hollowing,

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the nurse "Ms. Rice or Price," looked at my left side and said "O my God", she begin filling out a body chart, she then left the room and went to the back, when she returned, she said that she was going to send me to the hospital at Jackson. About five (5) mins. later, she was told that a phone call was for her, when she returned, she said the doctor "Bell" told her not to send me to the hospital, but to admit me in the infirmary until Monday when a X ray can be done, plaintiff kept pleading with Nurse Rice to send him to the hospital because something was moving causing severe pain and swelling to his hip, she said that it was nothing that she could do but follow Dr. Bell's instructions.

41. On or about 9-30-2017, plaintiff was given a copy of his body chart for his hip injury. NOTE: This document shows that Tums for heart burns, HCTZ for my high blood pressure, tegretol to help me sleep, neurontine for nerve condition, "ALL OF WHICH PLAINTIFF WAS TAKING BEFORE HE FALL AND INJURED HIS HIP, NONE OF THESE MEDICATIONS HAD ANYTHING TO DO WITH THE HIP INJURY" the tylenol wrote on the chart was not one of the medications plaintiff was taking, "NOR DID THE NURSE EVER ADMINISTER TYLENOL TO HIM DURING THE TIME OF THE HIP INJURY," the chart shows that a X ray was set for 10-2-2017, the Practitioner was Dr. Bell and the Nurse was Blaircum "I think", "THE ONLY TIME PLAINTIFF SEEN THE NURSE IS WHEN IT WAS TIME FOR THE MEDICATION FOR NERVE DAMAGE! NOTHING "NO PAIN MEDICATION WAS GIVEN FOR THE HIP INJURY." See Exhibit 36

42. Plaintiff was taken back to the infirmary where it took three (3) inmates to get me out of the wheel chair because, everytime they tried to move me, I screamed, hollowed and crying telling them that something was moving in my hip, "THE NURSE WAS THERE WITNESSING ALL OF THIS."

43. After getting me in the bed, plaintiff had to lay on his back, I asked for some pain medication, AND WAS TOLD THAT DOCTOR BELL DID NOT APPROVE FOR ME TO HAVE ANY UNTIL AFTER THE X RAY ON MINDAY.

43. From September 29, 2017 til October 2, 2017, plaintiff was not given any medication for pain for his hip injury, during this time, plaintiff continued to ask, plead, for something to stop the pain, nothing was given, accept for my nerve condition.

45. PLAINTIFF MADE SUCH THAT HE DID NOT HAVE TO TAKE A DUMP, BY NOT EATING ANYTHING FOR THEM ABOUT THREE (3) DAYS.

46. Plaintiff only grinked a little amount of water to keep from peeing, all OF THESE ACTIONS WAS AIMED AT KEEPING FROM MOVING BECAUSE OF THE SEVERE PAIN.

47. Plaintiff laid on his back from 9-30-2017 til about 2:30 on 10-2-207 doing everything possible to keep from moving.

rn how t~~484~~ about 2:30pm on 10-2-2017, three (3) inmates got plaintiff out of the bed and placed him in a wheel chair and took him to the X ray room, THE X RAY REVEALED THAT PLAINTIFF HAD TWO (2) FRACTURES IN HIS LEFT HIP, THE AMBULANCE WAS CALLED AND PLAINTIFF WAS TRANSPORTED TO JACKSON HOSPITAL.

49. Once we arrived at the hospital, I was placed in a room, the doctor came in and asked me what happen, after explaining to him what happen, he asked for the x ray taken of my hip, he was told th~~it~~ the medical staff at Staton Health care did not send it.

50. The doctor then told the nurse to take an x ray, within about two (2) mins., the doctor came back, I TOLD HIM THAT I HAD NOT HAD ANYTHING FOR PAIN FOR THIS INJURY, THAT IT HAD BEEN ABOUT THREE (3) days sense the fall, he asked if I had any problems with taking morfin, I said no and he gave me a shot.

51. ~~Some hours later~~, I was awaken and was told th~~it~~ the operation went well, th~~at~~ a rod and screws had been put in my left hip to repair the two (2) fractures.

52. On October 6, 2017, plaintiff was released from Jackson Hospital and taken to Kilby Corrections Infirmary, while there, I was given tylenol four (4) or three (3) to help with the pain.

53. Plaintiff tried to get out of the bed for about two (2) days but could'nt, had to pee in a bottle, could'nt take a dump, in order to take a shower, plaintiff had to ask some of the other inmates there who also had their own medical problems to help him to the shower area.

Plaintiff could'nt take his clothes off, could'nt shower on his own, THESE INMATES UNDRESSED, SHOWERED AND DRESSED PLAINTIFF FOR ABOUT A WEEK, BECAUSE HE COULD NOT DO IT HIMSELF OR GET ANY ASSITANCE FROM THE NURSING STAFF, STANDING, WALKING AND BENDING WAS NOT POSSIBLE, THESE INMATES HAD TO HOLD PLAINTIFF UP, AND WASH HIS WHOLE BODY FOR THESE TWO (2) WEEKS.

54. Plaintiff asked the Doctor "Ramine" for a physical tearopy to help with standing and walking, THE DOCTOR "RAMINE" TOLD PLAINTIFF THAT THEY DON'T PROVIDE PHYSICAL THEAROPY, THAT IF I WANT TO LEARN HOW TO WALK AGAIN, THAT I HAVE TO DO IT ON MY OWN.

55. During the time at kilbny "HCU" plaintiff did not get any help from no nurse or doctor in helping me bath, ch~~h~~ge clothes, standing or walking, they brought me medication for my nerve condition and for the hip injury, ALL THE OTHER HELP RECEIVED WAS FROM OTHER INMATES WHO HAD THEIR OWN MEDICAL PROBLEMS TO WORRY ABOUT. One of the other inmates gave plaintiff a walker and helped him learn how to use it.

56. On October 18, 2017, some officers came from draper corrections to take me to staton health care infirmary "HCU," WHEN PLAINTIFF WAS WAITING TO BE CHECKED OUT AT KILBY RECEIVING, SOMEONE FROM THE NURSES STATION CALLED AND TOLD THE RECEIVING OFFICER TO NOT LET ME TAKE THE WALKER WITH ME, THE OFFICER SEEN AND I EXPLAINED THAT I COULD NOT STAND OR WALK WITHOUT IT, BUT THE OFFICER SAID HE HAD NO OTHER CHOICE BUT TO GET IT FROM ME.

The two (2) officers that came to transport plaintiff back to Staton HCU, HAD TO PHYSICALLY PICK PLAINTIFF UP AND CARRY HIM TO THE TRANSPORT VAN, WHILE THIS WAS HAPPENING, IT FELT LIKE MY HIP WAS BEING TAKEN APART, IT HAD ME HOLLOWING AND CRYING, IT HAD BEEN ONLY ABOUT TWO (2) WEEKS SENSE THE SURGERY TO REPAIR THE FRACTURES IN MY HIP.

56. Once we got to Staton HCU, a wheelchair had to be brought to the van to get me.

57. On or about 10-18-2017, plaintiff inquired about getting a physical therapy to help with standing and walking, was told once again that no physical therapy is given.

58. Plaintiff had to continue to rely on other inmates to help with bathing, the nurses at Staton like at Kilby would not assist in anything accept to give medication, any and everything to do with my mobility was problematic because no professional assisted in the recovery.

59. Plaintiff was released from Staton Health Care HCU on October 23, 2017 and went to Draper pill call to get pain medication and was told that NONE was there for me, TO FILL OUT A SICK CALL REQUEST, this was on 11-2-2017.

60. On 11-7-2017, plaintiff was seen by a provider (Blairum" i think that's her name, anyway, I informed her that I had not had any pain medication for my hip and that it seems as if something was moving, that it had also intensified the nerve condition in my left leg, that i could not lay on either side or stomach because of the pain.

This provider displayed such a negative attitude and unprofessional behavior, that plaintiff had to leave.

61. Plaintiff filed a grievance on all medical problems on 12-6-2017, the response from Ms. Johnson was that she was sorry that I was having these issues and scheduled an appointment to see Dr. Bell and also stated that if I had any more problems, to let the officer know so I can be sent over to, HCU, this was on 12-14-2017. See Exhibit 37

62. On 12-18-2017, plaintiff filed another grievance against Dr. Bell for

his retaliatory attitude and unprofessional behavior, he did not want to treat/evaluate or examine any of the medical problems complained about, he told me that if i keep on complaining, that he was not going to see me any more, I TRIED TO EXPLAIN TO HIM WHAT WAS GOING ON WITH MY MEDICAL CONDITIONS, HE THEN GOT UP AND WALKED AWAY AND TOLD THE OFFICER TO SEE ME OUT. As stated, he never asked plaintiff to pull his pants down to exvauate the swelling, ankle, leg, hip, nor the CYST THAST HAS BEEN GROWING FOR THE PAST TWO (2) YEARS, THAT TO THIS DAY IS STILL CAUSING SEVERE PAIN AND GETTING BIGER , Ms. johnson again stated that she was sorry about the issues tht I was having, this was 12-19-2017
See Exhibit 8 The grievance filed on 12-6-2017 and 12-18-2017 was sent to, CORIZON HEALTH CORPORATE OFFICE 103 POWELL COURT BRENTWOOD, TN. 37027 ALSO TO LARRY A. LINTON VICE PRESIDENT OF OPERATIONS CORIZON INMATE MEDICAL SERVICE 101 AIRPORT COMMONS DRIVE CALERA, ALABAMA 35040.....plaintiff has forwarded numerous copies of his grievances to these same officals of corizon medical services putting them on notice of the problems plaintiff was hving with the medical staff at staton ██████████ health care (HCU), and h've never received a response from them to date.

63. Plaintiff filed a grievance on 1-16-2018 which was a continuation of the two filed on 12-6-2017 and 12-18-2017, complaining about the same issues with not receiving proper/adequate medical attention/treatment. Plaintiff was told tht a physical therapist or orthopedic would be seeing me, however, plaintiff did not see a physical terapist until after this grievance was filed, which was on 1-24-2018, plaintiff was given a folder with about ten (10) cartoons drawn on it showing how to do excercises, NO PHYSICAL THERAPY WAS DONE, IT TOOK ABOUT TEN (10) mins. for him to draw these cartoons and then he left, the next day plaintiff seen Dr. BELL, 1-25-2018

A P Munyard responded to this grievance, and fasely stated that plaintiff did not show for an onsite PL, CORIZON'S CORPORATE?OPERATIONS OFFICE WAS SENT A COPY OF THIS GRIEVANCE ALSO, NO RESPONSE HAVE BEEN GIVEN. See Exhibit 39.

64. Plaintiff continue to suffer with severe pain to his hip, ankle, knee, left leg, and the severe pain from the nerve condition that h's yet to be resolved, the die test ordered by the nrsugeon was stopped by Dr. Bell, theieby stopping the much needed operation to correct the nerve condition.

65: PLAINTIFF WAS ON A CANE FOR OVER TWO (2) years due to this nerve condition, has been on a walker for the past six (6) or more months because the hip injury caused the nerve condition to worsen, where as plaintiff's leg was giving out about once a month, NOW IT GIVES OUT ABOUT THREE (3) TO FOUR (4) times a day now, the medical staff has been put on notice of these problems, and nothing has been done to correct them. Plaintiff still suffer from pain to his penis, when peeing it still burns and smell bad, the cyst behind the knee is still getting large and causing severe pain, the medications given goes not reach nor stop the pain to all of these areas complained about and the medical staff seems to not care wheather or not plaintiff receive his much needed treatment to correct them.

66. About four (4) days after the hip surgery "operation," plaintiff was transferred to Kilby Corr. fac. Health Care "HCU," where the Doctor there was "Dr. Ramine," throughout the about twelve (12) days there.

67. Doctor Ramine "NEVER PHYSICALLY" touched, examined, nor evaluated plaintiff to see how the surgery went and or how it effected plaintiff.

68. No nurse examined, evauated, nor treated plaintiff while at Kilby HCU.

69. Plaintiff complainedt numerous times to Dr. Ramine and the nurses that he was not able to get out of the bed, that he needed some assistance in going to the rest room to take a dump, to take a shower and to get back standing and walking again.

70. Plaintiff was told by "Dr. ramine" that he would have to get out of bed himself and do these things himself.

71. Plaintiff could not get out of bed on his own, much less walk to the restroom and shower area.

72. Plaintiff layed in his bed for days having to take a dump but could not because no one in the medical staff assisted him in getting out of the bed and to the restroom.

73. Doctor Ramine would not allow me to have a wheelchair for these pirposes, nor a walker.

74. Finally, some of the inmates there with their own medical conditions started to assist me, some would help me to the tollet, and others would help me to the shower area, where they would physically take my clothes off for me because I could not bend over, could not stand on my own, nor shower myself.

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CONTINUE ACTUAL FACTS

75. After these inmates showered me, they put my clothes on and took me back to the bed and helped me get in.

76. "The only thing the nurses did to assist me was to bring medications, Dr. Ramine would come around the infirmary to each inmate bed, and all he would do is to ask how you doing, and then Dr. ramine would go to the next inmate's bed without physically treating, examining, evauating or touching this plaintiff.

77. Dr ramine was asked by Plaintiff for assistance from a physical theropy, Dr. ramine told plaintiff that they do not provide them, that anything that I needed done, I would have to do it myself.

78. If it had not been for the assistance from the other inmates, plaintiff would have "messed""dumoed" on himself, would have been smelling like a dead dog and would not have been able to stand nor walk in the time that he did while there, from Oct. 6, 2017 til Oct. 18, 2017.

79. After Dr. ramine seen these inmates helping plaintiff with a walker, he wrote plaintiff a profile, however, when the officers came to take plaintiff back to Staton Health care HCU infirmary, the walker was taken from me at receiving by the officer on duty because someone from the medical staff said that I could not take it with me.

80. The officer did'nt want to take it because he seen that I couled not walk without it, but he had to no choice, the mediacl staff would not send a wheelchair there for me, the two (2) officers had to physically pick me up and carry me to the van numerous car links away.

81. the pain was so intense and severe, that plaintiff had tears running down his face, the officers did not know how to properly pick me up and carry me, they did the best that they could under the circumstances, putting me in the van was real problematic, because the severe pain that I was having was causing me to hollow and cry even more, no one from the medical staff assisted in helping the officers get plaintiff from receiving to the van.

82. Plaintiff has been told at least sixteen (16) times to fill out a sick call request to have medication renewed, when complaining about the nerve pain, hip pain and pain in penis.

83. When seen by a nurse at sick call screening, the main thing they wanted first was for you to sign the co-payment form, "IF YOU REFUSE, THEY WILL NOT SEE YOU," but after signing it, they will only take vital signs and would not allow for you to be seen by a provider or doctor, I was always told to check the news letter for appointment, in the mean while, no medication or treatment was given until plaintiff filed a grievance putting them "Staton Medical Staff" on notice that a copy was being sent to their Corporate Headquarters, and one (1) for civil action purposes.

84. Plaintiff filed over eighteen (18) grievances complaining about no pain medication, that it was not stopping the pain to left leg, penis, hip and back, on how nonprofessional he was treated by the medical staff "Doctors, nurses and providers.

85. These are the many different types of pain that plaintiff has been suffering from/experiencing for the past two (2) years and about nine (9) months pertaining to the severe nerve condition to my left leg.

(a) MY FRONT PART OF THE LEFT LEG HAS A SOLID TYPE OF PAIN THAT SEEKS TO INTENSIFIES WHEN WALKING.

(b) The back of my left leg has a cyst on it that has been growing "getting bigger" where it causes a electric shock type pain, that never stops, NO specific pain medication has been given nor has there been any medical treatment nor evaluation done, and plaintiff has not been given any consultation regarded this cyst.

(c) My ankle has a crushing like pain that intensifies when the medical staff take alone time in renewing the neurotine for the nerve condition and when walking.

(d) My whole left leg has been in constant pain for about three (3) years now with no relief in sight (e) the neurotine given three (3) times daily does not stop the pain, the medical staff has been placed on notice numerous time of this, but continue to keep me on this medication without either adding something with it or giving more milli grams of the neurotine, it just make it where I can use a walker to move around with.

86. These are the different types of pain associated with my left hip injury, in which a rod and four (4) screws was placed in it during the operation at Jackson Medical Center.

(a) When trying to make my bed as required by A.D.O.C. rules, the pain level is like a big heart beat, making it where I have to take breaks just to make my bed because of the pain associated with it.

(b) When lying down, I have to switch from one (1) side to the next, because laying down causes sharp pain to my hip, when trying to straighten my left leg out, it feels as if something is keeping it from moving, "like it is stuck," causing even more pain.

(c) I HAVE INFORMED THE MEDICAL STAFF OF THIS NUMEROUS TIMES THAT SOMETHING CONTINUE TO MOVE IN MY HIP CAUSING SEVER PAIN.

83. This is the severe pain associated with the tear to the inside of my left leg that the doctor (Bell) said needed surgery on.

(a) It's like the side of my left knee is being pulled apart when bending, turning and when lying in the bed, I have to put a towel or something soft between my knees to keep them from touching, because of the severe pain that it cause.

84. Plaintiff's penis has a pain like something I've never experienced before, it's solid and strong like going up a ladder, with each step the pain gets worse, sometimes I hate when I have to take a pee, because the pain turns into a strap like pain.

Plaintiff has verbally complained about these pains to penis numerous times because the filing of grievances concerning this medical problem, seems to be to no avail, all was said by the medical staff is that it was a yeast infection, however, this particular medical condition has gone without any body physically touching the penis to examined, evaluate, or treat, the only thing done was to give me some cream that only made a mess, DID NOT ELIVIATE THE CONDITION NOR STOP THE PAIN ASSOCIATED WITH THIS MEDICAL CONDITION, PLAINTIFF HAS BEEN SUFFERING FROM THIS MEDICAL PROBLEM TO HIS PENIS FOR SOME YEARS NOW WITH NO RELIEF IN SIGHT.

85. PLAINTIFF HAS BEEN TRYING TO DEAL WITH ALL THESE DIFFERENT TYPES OF PAIN FOR ABOUT THREE (3) YEARS NOW.

The medications given from the start up to this point does not correct my, NERVE CONDITION, HIP CONDITION, PENIS CONDITION KNEE CONDITION NOR BACK CONDITION, THE MEDICAL STAFF UNDER THE CONTROL OF CORIZON INC. MEDICAL SERVICES, GIVES YOU PAIN MEDICATION THAT DOES NOT ACTUALLY STOP THE PAIN BUT CUTS IT DOWN SOME, STILL PLAINTIFF HAS THE MEDICAL CONDITIONS THAT HAS GONE UN CORRECTED, "RESOLVED."

86. day and Night I have to suffer because nothing has been done to resolve/correct these serve medical conditions.

87. Thier is no complaint against Waeden/Deputy Commissioner Ellison, THE ONLY RESON THAT HE IS BEING PLACED IN THIS SUIT , IS BECAUSE I AM IN HIS CUST ODY AND CONTROL, AND I WANTED TO POINT OUT HIS ROLE CONCERNING MY MEDICAL CONDITION?TREATMENT etc..

Each time tht I went to Mr. Ellison having to hold on to the wall just to stand and walk, crying because of the severe pain, "he sent me over to Staton Health care HCU for an emergency, not once did he refuse to help me when I went to him or saw him on the hall where he seen first hand how severe my medical condition were.

I seen Mr. Ellison here at Limestone Corr. Fac. around the first of this month "may 2018", and the first thing Mr. Ellison asked was why was I on a walker, and I explained to him how the operation was counseled by the new Doctor Bell without my knownledge and while i waiting, the nerve condition caused my left leg to give out while walkling and I fell and fractured my hip in two (2) places, tht the hip operation where four (4) screws and a rod was incerted.

Mr. Ellison showed real concern about my medical problems, before leaving, he told me to be careful and to take care of myself. We talked about other things concerning where i lived, if any of me family visted me or not and if I was closed to where they lived, talking with him made me fill like he really cared.

Although Me. ellison sent me over in an emergency, the medical sraff did nothing but take vital signs and told me that they would put me on the list to see the doctor, and then sent me back each time to Draper in the same condition I was in when the warden at that time sent me over, other inmates had to once again help me across the field and back to my dorm and helped me into the bed, plaintiff laid there suffering with this severe pain until is clamed down itself, this happen at least two (2) times tht the warden sent me over for an emergency.

88. Plaintiff's medical condition has deterioated and is now detrimental to his overall health, before this nerve damage occured, plaintiff was outgoing, exercising everyday, playing defferent types of ball games, running, lifting weighs, and walking at a fast pace.

Now plaintiff is confined to a walker, can't do any of the exercises now, my left leg is in constant pain even with the type of medications given, when plaintiff is walking, plaintiff walk's at a pace slower than slow because the more I try to speed up, the more the pain increases.

89. Doctor Bell came on as the physician at Staton HCU at the time when the operation had been scheduled on my back to correct the nerve damage that was causing the severe pain to left leg.

He counseled the operation knowing that the neurosurgeon was waiting on the results of the "DIE TEST," WHICH HE COUNSELD ALSO, this was done unilaterally to save Corizon Inc., money because he knew that they was in the middle of contract negotiations with ADOC.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

SEE ATTACHED SHEET"

Barbier M. Ward
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on May 28th, 2018.
(Date)

Barbier M. Ward
Signature of plaintiff(s)

R E L I E F S O U G H T

1. Plaintiff is suing Corizon Inc. Medical Services under the Eight Amendment to the United States Constitution for violation of his rights by implementing a policy, custom, and practice that has caused unnecessary and wandeon infliction of pain for budgetary and or financial reasons/gains. Corizon is being sued in thier official and individual capacities for the amount of \$5,000 in compensatory damages and punitive damages in the amount of \$3,000.

2. Plaintiff is suing Doctor Bell for compensatory damages in the amount of \$5,000 and punitive damages in the amount of \$3,000 in his official and individual capacities for forcing plaintiff to suffer undue, unnecessary wandon and infliction of pain for about three (3) days with two (2) fractures in his left hip, without prescribing and or administering any pain medication for this injury, and "not approving for plaintiff to be sent to the hospital for an emergency because of profits and or finacial gain to benefit Corizon Inc. In violation of his right not to be subjected to cruel and unusual punishment. Eight Amendment.

3. Plaintiff is suing Doctor Ramine for compensatory damages in the amount of \$5,000 and punitive damages in the amount of \$3,000 in his oddicial and individual capacities for the deliberate indifference to his serious medical needs while under his care for about twelve (12) days without any physical medical assistant to help with getting in and out of the bed, with taking a shower, dressing and underssing, with learning how to walk over again etc. after having the operation for the two (2) fractures in his left hip.

4. Plaintiff is suing Crizon Inc., Medical Services in their official and individual capacities for compensatory damages in the amount of \$1,000 and punitive damages in the amount of \$500,00 for their intent in instituting restrictions on accessing outside medical care for the back sugery to correct the severe nerve damage in left leg AS EXPLICIT TO CONTAIN COSTS.

5. Plaintiff is suing Doctor Bell for \$3,000 in compensatory damages and \$1,000 in punitive damages for the three (3) day delay in sending him to the emergency room after he fail and fractured his hip in two (2) places. Eight Amendment Violation

6. Plaintiff is suing Doctor Bell for \$3,000 in compensatory damages and \$1,000 in punitive damages for his delay tactic by counseling the "DIE TEST" ordered to determine how bad and where the nerve damage was

Before performing the back surgery.

7. Plaintiff is suing Corizon Inc., in their official and individual capacities in the amount of \$3,000 in compensatory damages and in the amount of \$2,000 in punitive damages for being deliberately indifferent to plaintiff's serious medical needs in that, Corizon failed to respond appropriately to his severe nerve condition, pain and burning to penis, painful cyst behind left knee, and the painful movement in left hip from the surgery of the two (2) fractures.

8. Plaintiff ask that this Honorable Court will dismissed from the suit Warden estes and Institutional Corinator Ellison because, (1) The fact that Ellison when he was warden at Draper Corrections at the time of the constitutional violations by Corizon Inc., "he sent plaintiff over to the health care (HCU) in an emergency on a number of occasions."

Plaintiff ask that this part "his actions" be admitted as evidence in this case to show how deliberate indifference these defendants "Corizon Inc., Medical Services, Doctor Bell and or Doctor Ramine was to plaintiff serious medical condition/needs and the severe pain associated with these medical conditions.

Plaintiff ask that Warden estes be dismissed as defendant due to the fact that he is being added only because he has physical control "custody" over this plaintiff, he had no knowledge of the incidents concerning Corizon Inc., and Doctors Bell and Ramine.

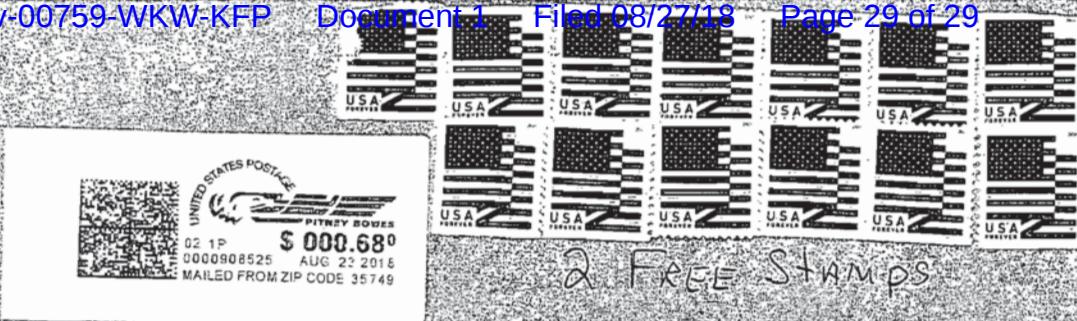
Rasbian M. Ward
Rasbian M. Ward (Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED ON May 28th, 2018
Date

Rasbian M. Ward
Rasbian M. Ward #153328

2 F



Rasbian M. Ward AIS 153328
Limestone Correctional Facility H1-43A
28779 Nick Davis Road
Harvest, Alabama 35749

OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
One Church Street, Suite B-110
Montgomery, Alabama 36104-4018

"LEGAL MAIL"